



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 12, 2025

BY ECF

The Honorable Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute v. Central Intelligence Agency, et al.*, 22 Civ.
1542 (CM)

Dear Judge McMahon:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. We write jointly with counsel for plaintiff to provide a status report, as proposed in our status report of last week, ECF No. 64, which the Court endorsed, ECF No. 65.

Since the last status report, plaintiff has now determined that it will not challenge any agency's response to the requests at issue in this case. Thus, the merits of this action are resolved, and the only remaining issue is plaintiff's claim for attorneys' fees and costs. In order to provide plaintiff time to prepare its demand and provide supporting time records, and to allow the parties to discuss the demand, we respectfully propose filing a further status report in two months, or by May 12, 2025.

We thank the Court for its attention to this matter.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney
Southern District of New York

By: */s/ Peter Aronoff*
PETER ARONOFF
Assistant United States Attorney
Telephone: (212) 637-2697
E-mail: peter.aronoff@usdoj.gov

Counsel for defendants

cc: Counsel for plaintiff (via ECF)